

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN**

GEICO CORPORATION
GOVERNMENT EMPLOYEES
INSURANCE COMPANY
GEICO GENERAL INSURANCE
COMPANY GEICO INDEMNITY
COMPANY
GEICO CASUALTY COMPANY
GEICO ADVANTAGE INSURANCE
COMPANY GEICO CHOICE INSURANCE
COMPANY GEICO SECURE INSURANCE
COMPANY GEICO COUNTY MUTUAL
INSURANCE COMPANY

Case No. 16-cv-13189

Judge: Hon. Marianne Battani

Magistrate Judge: Hon. Mona Majzoub

**STIPULATION SETTING RESPONSIVE
PLEADINGS AND MOTIONS BRIEFING
SCHEDULE**

Plaintiffs,

v.

AUTOLIV, INC.
AUTOLIV ASP, INC.
AUTOLIV B.V. & CO. KG
AUTOLIV SAFETY TECHNOLOGY, INC.
AUTOLIV JAPAN LTD.
HITACHI AUTOMOTIVE SYSTEMS, LTD.
LEAR CORPORATION
KYUNGSHIN-LEAR SALES AND
ENGINEERING, LLC
NIPPON SEIKI CO., LTD.
N.S. INTERNATIONAL, LTD.
NEW SABINA INDUSTRIES, INC.
PANASONIC CORPORATION
PANASONIC CORPORATION OF NORTH
AMERICA
T.RAD CO. LTD.
T.RAD NORTH AMERICA
TRW DEUTSCHLAND HOLDING GMBH
ZF TRW AUTOMOTIVE HOLDINGS
CORP.

Defendants.

Plaintiffs GEICO Corporation, Government Employees Insurance Co., GEICO General Insurance Co., GEICO Indemnity Co., GEICO Casualty Co., GEICO Advantage Insurance Co.,

GEICO Choice Insurance Co., GEICO Secure Insurance Co., GEICO County Mutual Insurance Co. (“Plaintiffs”) and Defendants TRW Deutschland Holding GmbH, and ZF TRW Automotive Holdings Corp. (collectively, “TRW Defendants”), by and through their undersigned counsel, stipulate as follows:

WHEREAS Plaintiffs filed their Complaint on September 2, 2016 and subsequently filed an Amended Complaint on November 9, 2016.

WHEREAS TRW Defendants agreed to waive service pursuant to Federal Rule of Civil Procedure 4(d) and acknowledge receipt of the Amended Complaint.

WHEREAS, TRW Defendants’ waiver of service is solely for the purposes of this matter and the TRW Defendants reserve their right to require service of process under applicable law in all other matters.

WHEREAS Plaintiffs and TRW Defendants have agreed upon a schedule for filing pleadings and motions in response to the Amended Complaint and subsequent briefing.

NOW THEREFORE, IT IS HEREBY STIPULATED, subject to Court approval, the following schedule shall govern the timing for filing responsive pleadings to the Amended Complaint and any subsequent briefing:

1. TRW Defendants will file pleadings or motions in response to the Amended Complaint by Friday, March 31, 2017.
2. If TRW Defendants file Motion(s) in response to the Amended Complaint, Plaintiffs will file their Response(s) to the Motion(s) by Tuesday, May 30, 2017.
3. TRW Defendants will file their Reply or Replies in support of their Motion(s) by Friday, July 14, 2017.

DATED: December 27, 2016

/s/Rebecca J. Cassell

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*Attorneys for Plaintiffs with respect to their
claims
against the TRW Defendants and as local
counsel
for the remainder of Plaintiffs' claims*

/s/Howard B. Iwrey

Howard B. Iwrey
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*Attorney for ZF TRW Automotive Holdings
Corp. and TRW Deutschland Holding GmbH*

CERTIFICATE OF SERVICE (CM/ECF)

I hereby certify that on December 27, 2016, I electronically filed the foregoing STIPULATION SETTING RESPONSIVE PLEADINGS AND MOTIONS BRIEFING SCHEDULE with the Clerk of Court using the ECF system which will send notification of such filing to the ECF participants.

Dated: December 27, 2016

/s/Howard B. Iwrey
Howard B. Iwrey
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